1 2 3 4 5 6 7 UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON 10 AT SEATTLE 11 KING COUNTY. 12 Plaintiff. Case No. 2:18-cv-00758 13 v. [PROPOSED] ORDER GRANTING 14 BP P.L.C., a public limited company of PARTIES' STIPULATED MOTION England and Wales, CHEVRON REGARDING SCHEDULE FOR 15 CORPORATION, a Delaware corporation, FRCP 26(a)(1) CONFERENCE, CONOCOPHILLIPS, a Delaware INITIAL DISCLOSURES, AND 16 corporation, EXXON MOBIL JOINT STATUS REPORT AND CORPORATION, a New Jersey corporation, **DISCOVERY PLAN** ROYAL DUTCH SHELL PLC, a public 17 limited company of England and Wales, and DOES 1 through 10, 18 19 Defendants. 20 21 The Court, having received and reviewed the Parties' Stipulated Motion, and good cause 22 appearing, IT IS HEREBY ORDERED: 23 The deadline for a FRCP 26(f) Conference shall be July 11, 2018. 1. 24 2. Initial Disclosures pursuant to FRCP 26(a)(1) shall be due by July 18, 2018. 25 3. A Combined Joint Status Report and Discovery Plan as required by FRCP 26(f) 26 and LCR 26(f) shall be due by July 25, 2018. 27 Neither the Stipulated Motion nor this Order shall operate as an admission of 4. 28

Case 2:18-cv-00758-RSL Document 78-1 Filed 06/21/18 Page 2 of 5

any factual allegation or legal conclusion, nor shall it operate as a waiver of any right, defense, affirmative defense, claim, or objection, including lack of personal jurisdiction, insufficient process, or insufficient service of process. day of June, 2018. UNITED STATES DISTRICT JUDGE

Case 2:18-cv-00758-RSL Document 78-1 Filed 06/21/18 Page 3 of 5

1	Presented by:	
2	/s/ Kevin Wright	**/s/ Theodore J. Boutrous, Jr.
	/s/ Jennifer Stacy	/s/ Joshua S. Lipshutz /s/ Robert M. McKenna
3	/s/ Steve W. Berman	/s/ Adam Nolan Tabor
	/s/ Barbara A. Mahoney	/s/ Herbert J. Stern
4	/s/ Matthew F. Pawa	/s/ Joel M. Silverstein
	/s/ Benjamin A. Krass	/s/ Neal S. Manne
5	/s/ Wesley Kelman	/s/ Erica Harris
		The state of the s
6	Kevin Wright	Theodore J. Boutrous, Jr. (pro hac vice)
_	Jennifer Stacy	Joshua S. Lipshutz (pro hac vice)
7	Senior Deputy Prosecuting Attorneys	GIBSON, DUNN & CRUTCHER LLP
o	KING COUNTY PROSECUTING	333 South Grand Avenue
8	ATTORNEY'S OFFICE CIVIL DIVISION	Los Angeles, CA 90071
9	516 Third Avenue, Suite 400	Telephone: +213 229 7000
9	Seattle, WA 98104	Facsimile: +213 229 7520
10	Telephone: (206) 477-1120	E-mail: tboutrous@gibsondunn.com
10	Facsimile: (206) 296-0191	E-mail: jlipshutz@gibsondunn.com
11	1 455111110. (200) 270 0171	
	Steve W. Berman (WSBA No. 12536)	Robert M. McKenna (WSBA No. 18327)
12	Barbara A. Mahoney (WSBA No. 31845)	Adam Nolan Tabor (WSBA No. 50912)
	HAGENS BERMAŇ SOBOL SHAPIRÓ	ORRICK, HERRINGTON & SUTCLIFFE
13	LLP	LLP
	1918 Eighth Ave. Suite 3300	701 Fifth Ave., Suite 5600
14	Seattle, WA 98101	Seattle, WA 98104 Telephone: +1 206 839 4300
	Telephone: (206) 623-7292	Facsimile: +1 206 839 4301
15	Facsimile: (206) 623-0594	E-mail: rmckenna@orrick.com
	E-mail: steve@hbsslaw.com	E-mail: atabor@orrick.com
16	E-mail: barbara@hbsslaw.com	12 man autority of the control of th
17	Matthaxy E Dayya (neo haa vica)	Herbert J. Stern (pro hac vice)
1 /	Matthew F. Pawa (pro hac vice) Benjamin A. Krass (pro hac vice)	Joel M. Silverstein (pro hac vice)
18	Wesley Kelman (pro hac vice)	STERN & KILCULLEN, LLC
10	HAGENS BERMAN SOBOL SHAPIRO	325 Columbia Turnpike, Suite 110
19	LLP	P.O. Box 992
^_	1280 Centre Street, Suite 230	Florham Park, NJ 07932-0992
20	Newton Centre, MA 02459	Telephone: +973 535 1900
	Telephone: (617) 641-9550	Facsimile: +973 535 9664
21	Facsimile: (617) 641-9551	E-mail: hstern@sgklaw.com
	E-mail: mattp@hbsslaw.com	E-mail: jsilverstein@sgklaw.com
22	E-mail: benk@hbsslaw.com	Neal S. Manne (pro hac vice)
	E-mail: wesk@hbsslaw.com	Erica Harris (pro hac vice)
23		SUSMAN GODFREY LLP
	Attorneys for Plaintiff KING COUNTY	1000 Louisiana, Suite 5100
24		Houston, TX 77002
25		Telephone: 713.651.9366
25		Facsimile: 713.654.6666
26		E-mail: nmanne@susmangodfrey.com
26		E-mail: eharris@susmangodfrey.com
27	·	
~′		Attorneys for Defendant CHEVRON
28		CORPORATION

1		** Pursuant to this Court's Electronic Filing Procedure III.L, the electronic signatory has
2		obtained approval from all other signatories
3		
4	/s/ Angelo J. Calfo	/s/ Eric P. Tuttle
5	/s/ Theodore V. Wells, Jr. /s/ Daniel J. Toal	Eric P. Tuttle (WSBA No. 46820)
6	/s/ Jaren E. Janghorbani /s/ Dawn Sestito	MUNGER, TOLLES & OLSON LLP 350 South Grand Avenue, 50th Floor
7	/s/ M. Randall Oppenheimer	Los Angeles, California 90071-3426 Telephone: (213) 683-9100
8	Angelo J. Calfo, WSBA #27079 CALFO EAKES & OSTROVSKY PLLC	Facsimile: (213) 687-3702 E-mail: eric.tuttle@mto.com
. 9	1301 Second Avenue, Suite 2800 Seattle, WA 98101	Attorneys for Defendant ROYAL DUTCH
10	Telephone: (206) 407-2200 Facsimile: (206) 407-2224	SHELL PLC
11	E-mail: angeloc@calfoeakes.com	
12	Theodore V. Wells, Jr. (pro hac vice forthcoming)	
13	Daniel J. Toal (<i>pro hac vice forthcoming</i>) Jaren E. Janghorbani (<i>pro hac vice</i>	
14	forthcoming) PAUL, WEISS, RIFKIND, WHARTON &	
15	GARRISON LLP 1285 Avenue of the Americas	
16	New York, NY 10019-6064 Telephone: (212) 373-3000	
17	Facsimile: (212) 757-3990 E-Mail: twells@paulweiss.com	
18	E-Mail: dtoal@paulweiss.com	
19	E-Mail: jjanghorbani@paulweiss.com	
20	M. Randall Oppenheimer (pro hac vice forthcoming)	
21	Dawn Sestito (pro hac vice forthcoming) O'MELVENY & MYERS LLP	
22	400 South Hope Street Los Angeles, California 90071-2899	
23	Telephone: (213) 430-6000 Facsimile: (213) 430-6407	
24	E-Mail: roppenheimer@omm.com E-Mail: dsestito@omm.com	
25	Attorneys for Defendant EXXON MOBIL CORPORATION	
26	COM OMITION	
27		
28		

Case 2:18-cv-00758-RSL Document 78-1 Filed 06/21/18 Page 5 of 5

1	/s/ Jonathan W. Hughes	/s/ Katherine A. Christofilis
	/s/ Matthew T. Heartney	/s/ Marshall Ferguson
2	/s/ John D. Lombardo	/s/ Sean C. Grimsley
3	/s/ Phillip H. Curtis /s/ Nancy Milburn	/s/ Jameson R. Jones /s/ Tracie J. Renfroe
3	/S/ INUNCY IVILIOUIN	/s/ Carol M. Wood
4	Jonathan W. Hughes	
	ARNOLD & PORTER KAYE SCHOLER	Marshall Ferguson, WSBA #29528
5	LLP	Katherine A. Christofilis, WSBA #42584
	Three Embarcadero Center, 10th Floor	WILLIAMS, KASTNER & GIBBS PLLC
6	San Francisco, California 94111-4024	601 Union Street, Suite 4100
_	Telephone: (415) 471-3100	Seattle, WA 98101-2380
7	Facsimile: (415) 471-3400	Telephone: (206) 628-6600
o	E-mail: jonathan.hughes@apks.com	Fax: (206) 628-6611 mferguson@williamskastner.com
8	Matthew T. Heartney	kchristofilis@williamskastner.com
9	John D. Lombardo	Kem istormster with a miskastner.
	ARNOLD & PORTER KAYE SCHOLER	Sean C. Grimsley (pro hac vice)
10	LLP	Jameson R. Jones (pro hac vice)
	777 South Figueroa Street, 44th Floor	BARTLIT BECK HERMAN
11	Los Angeles, California 90017-5844	PALENCHAR & SCOTT LLP
	Telephone: (213) 243-4000	1801 Wewatta St., Suite 1200
12	Facsimile: (213) 243-4199	Denver, Colorado 80202
12	E-mail: matthew.heartney@apks.com	Telephone: 303-592-3123 Facsimile: 303-592-3140
13	E-mail: john.lombardo@apks.com	Email: sean.grimsley@bartlit-beck.com
14	Philip H. Curtis	Email: jameson.jones@bartlit-beck.com
17	Nancy Milburn	man. Jameson.jones@outent occk.com
15	ARNOLD & PORTER KAYE SCHOLER	Tracie J. Renfroe (pro hac vice forthcoming)
	LLP	Carol M. Wood (pro hac vice forthcoming)
16	250 West 55th Street	KING & SPALDING LLP
1.77	New York, NY 10019-9710	1100 Louisiana Street, Suite 4000
17	Telephone: (212) 836-8383 Facsimile: (212) 715-1399	Houston, Texas 77002 Telephone: (713) 751-3200
18	E-mail: philip.curtis@apks.com	Facsimile: (713) 751-3290
10	E-mail: nancy.milburn@apks.com	E-mail: trenfroe@kslaw.com
19	2 man, maney mine armographic teem	E-mail: cwood@kslaw.com
	Attorneys for Defendant BP P.L.C.	G
20		Attorneys for Defendant CONOCOPHILLIPS
	•	
21		
22		
23		
24		
25		
25		
26		
20		
27		
28		